

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In Re: RYAN RAMIREZ

Case No.: 19-23215-JKS

Chapter: 7

Judge: John K. Sherwood

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**NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY**

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David Wolff, Trustee, in this case proposes a compromise, or to settle a claim and/or action as described below. If you object to the settlement or compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later 7 days before the hearing date.

Address of the Clerk:  
United States Bankruptcy Court  
50 Walnut Street  
3<sup>rd</sup> Floor  
Newark, NJ 07102

If an objection is filed, a hearing will be held before the Honorable John K. Sherwood on October 29, 2019 at 10:00 a.m. at the United States Bankruptcy Court, courtroom no. 3D, (hearing to be scheduled for at least 28 days from the date of the filing of the notice). If no objection is filed the clerk will enter a *Certification of No Objection* and the settlement may be completed as proposed.

Nature of Action:

The debtor is the owner, along with a non-debtor spouse, of real property located at 140 Chestnut Street, Belleville, New Jersey ("Property"). The Property was purchased for \$300,000, yet the debtor provided a comparative market analysis alleging the value was less. As a result, the Trustee communicated with his broker and requested an inspection of the interior and exterior of the Property. Following that inspection, the Trustee's broker valued the Property for \$315,000, which value has been accepted by the debtor for purposes of resolution. The outstanding mortgage on the Property is approximately only \$220,000. In addition, upon information and belief the aggregate sum of \$13,053.52 is being held by Wells Fargo in joint bank accounts in the name of the debtor and non-debtor spouse.

Pertinent terms of settlement:

In lieu of engaging in time-consuming and cost-consuming additional discovery and protracted motion practice and/or litigation, the parties have reached a settlement. The Trustee shall be entitled to receipt of the aggregate amount of \$13,053.52 to resolve the bankruptcy estate's net equity interest in the Property and bank accounts. Costs of sale and an allowable homestead exemption related to the Property have been considered as part of this resolution. If Wells Fargo remits to the bankruptcy estate less than the aggregate amount of \$13,053.52, the debtor shall be responsible to remit any shortfall.

Objections must be served on, and requests for additional information directed to:

Name: David Wolff, Esq.

Address: 396 Route 34, Matawan, New Jersey 07747

Telephone No.: (732) 566-1189

**Certificate of Notice Page 3 of 3**  
 United States Bankruptcy Court  
 District of New Jersey

In re:  
 Ryan Ramirez  
 Debtor

Case No. 19-23215-JKS  
 Chapter 7

**CERTIFICATE OF NOTICE**

District/off: 0312-2

User: admin  
 Form ID: pdf905

Page 1 of 1  
 Total Noticed: 15

Date Rcvd: Oct 01, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 03, 2019.

db +Ryan Ramirez, 140 Chestnut Street, Belleville, NJ 07109-1925  
 aty +Law Offices of David Wolff LLC, 396 Route 34, Matawan, NJ 07747-7116  
 cr +Daimler Trust, c/o BK Servicing, LLC, P.O. Box 131265, Roseville, MN 55113-0011  
 cr +Wells Fargo Bank, N.A., MAC #-F2303-01E, One Home Campus, Des Moines, IA 50328-0001  
 518338085 ++BANK OF AMERICA, PO BOX 982238, EL PASO TX 79998-2238  
 (address filed with court: Bank of America, P.O. Box 982238, El Paso, TX 79998)  
 518340078 +Christy Ramirez, 140 Chestnut Street, Belleville NJ 07109-1925  
 518338087 +Citibank NA, 701 East 60th Street North, Sioux Falls, South Dakota 57104-0493  
 518338088 +Colleen M. Hirst, Esq., Tenaglia & Hunt, PA, 395 West Passaic Street, Suite 205,  
 Rochell Park, NJ 07662-3016  
 518338089 +Eagle Rock Resort Co., 5495 Belt Line Road, Suite 200, Dallas, TX 75254-7658  
 518338091 ++TOYOTA MOTOR CREDIT CORPORATION, PO BOX 8026, CEDAR RAPIDS IA 52408-8026  
 (address filed with court: Toyota, 5005 N. River Blvd. NE, Cedar Rapids, Iowa 52411-6634)  
 518338092 +Wells Fargo Home Mortgage, P.O. Box 14411, Des Moines, IA 50306-3411

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
 smg E-mail/Text: usan.j.njbankr@usdoj.gov Oct 02 2019 00:22:22 U.S. Attorney, 970 Broad St.,  
 Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534

smg +E-mail/Text: ustpreregion03.ne.ecf@usdoj.gov Oct 02 2019 00:22:19 United States Trustee,  
 Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,  
 Newark, NJ 07102-5235  
 518338086 +E-mail/Text: customerservice@banleaco.com Oct 02 2019 00:22:15 Bankers Leasing,  
 P.O. Box 7740, Urbandale, Iowa 50323-7740  
 518338084 +E-mail/Text: M74banko@daimler.com Oct 02 2019 00:23:10 Mercedes Benz Financial,  
 P.O. Box 961, Roanoke, Iowa 76262-0961

TOTAL: 4

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

518338090 Sears CBNA

TOTALS: 1, \* 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address  
 pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 03, 2019

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 27, 2019 at the address(es) listed below:

David Wolff dwtrustee@verizon.net, NJ50@ecfcbis.com  
 Denise E. Carlon on behalf of Creditor Toyota Motor Credit Corporation  
 dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com  
 Kevin Gordon McDonald on behalf of Creditor Toyota Motor Credit Corporation  
 kmcdonald@kmlawgroup.com, bkgroup@kmlawgroup.com  
 Steven Martino on behalf of Debtor Ryan Ramirez SteveM@Iacullomartino.com,  
 DawnP@Iacullomartino.com  
 U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 5